

# EXHIBIT B

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November 20, 2024

**VIA EMAIL**

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**Re: MDL 3084 – Plaintiffs’ Compliance with Pretrial Order No. 10**

Counsel,

We write to discuss Plaintiffs’ obligations under Pretrial Order No. 10 (“PTO 10”). PTO 10 requires each Plaintiff who joined the MDL on or before March 26, 2024 to submit a complete PFS via MDL Centrality by no later than May 25, 2024—i.e., within 60 days after March 26, 2024. PTO 10 at 5. PTO 10 requires each Plaintiff who joins the MDL after March 26, 2024 to submit the complete PFS within 30 days after filing. PTO 10 at 6. On November 8, 2024, the Court adopted the stipulation entered between Levin Simes and Uber, extending the PFS deadlines for certain Plaintiffs represented by Levin Simes. Pursuant to the parties’ stipulation and the Court’s order, a “Plaintiff Fact Sheet for any Plaintiff represented by Levin Simes LLP who joined the MDL by September 2, 2024 and submitted a Pretrial Order No. 5 information sheet in lieu of a bona fide ride receipt” was due on November 15, 2024. ECF 1856 at 7.

The following Levin Simes Plaintiffs joined the MDL by September 2, 2024 and submitted an information sheet in lieu of a bona fide ride receipt but did not provide the required PFS by November 15, 2024:

1. LS 218, No. 3:23-cv-03970, MDLC ID 1116

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2. LS 134, No. 3:23-cv-03811, MDLC ID 1121
3. LS 259, No. 3:23-cv-04370, MDLC ID 1124
4. LS 231, No. 3:23-cv-04367, MDLC ID 1129
5. LS 293, No. 3:23-cv-04364, MDLC ID 1131
6. LS 67, No. 3:23-cv-04366, MDLC ID 1132
7. LS 144, No. 3:23-cv-04388, MDLC ID 1137
8. LS 364, No. 3:23-cv-05237, MDLC ID 1154
9. LS 112, No. 3:23-cv-05286, MDLC ID 1157
10. LS 365, No. 3:23-cv-05328, MDLC ID 1163
11. LS 284, No. 3:23-cv-05363, MDLC ID 1167
12. LS 126, No. 3:23-cv-05370, MDLC ID 1169
13. LS 265, No. 3:23-cv-05377, MDLC ID 1172
14. LS 200, No. 3:23-cv-05387, MDLC ID 1173
15. LS 66, No. 3:23-cv-05414, MDLC ID 1177
16. LS 317, No. 3:23-cv-05424, MDLC ID 1182
17. LS 234, No. 3:23-cv-05433, MDLC ID 1184
18. LS 103, No. 3:23-cv-05442, MDLC ID 1185
19. LS 25, No. 3:23-cv-05445, MDLC ID 1186
20. LS 191, No. 3:23-cv-05573, MDLC ID 1189
21. LS 302, No. 3:23-cv-05577, MDLC ID 1191
22. LS 273, No. 3:23-cv-05946, MDLC ID 1197
23. LS 303, No. 3:24-cv-05980, MDLC ID 2279
24. LS 269, No. 3:24-cv-05922, MDLC ID 2288
25. LS 279, No. 3:24-cv-05420, MDLC ID 2293
26. LS 55, No. 3:24-cv-05191, MDLC ID 2297
27. LS 6, No. 3:24-cv-05316, MDLC ID 2302
28. LS 7, No. 3:24-cv-05926, MDLC ID 2304
29. LS 226, No. 3:24-cv-05330, MDLC ID 2309
30. LS 139, No. 3:24-cv-05527, MDLC ID 2311
31. LS 491, No. 3:24-cv-05678, MDLC ID 2314
32. LS 518, No. 3:24-cv-05761, MDLC ID 2317
33. LS 230, No. 3:24-cv-06026, MDLC ID 2318
34. LS 140, No. 3:24-cv-05929, MDLC ID 2325
35. LS 122, No. 3:24-cv-05332, MDLC ID 2326
36. LS 93, No. 3:24-cv-05925, MDLC ID 2327
37. LS 436, No. 3:24-cv-05804, MDLC ID 2328
38. LS 519, No. 3:24-cv-05759, MDLC ID 2329
39. LS 248, No. 3:24-cv-05647, MDLC ID 2331
40. LS 470, No. 3:24-cv-05207, MDLC ID 2332
41. LS 321, No. 3:24-cv-06036, MDLC ID 2336
42. LS 484, No. 3:24-cv-05824, MDLC ID 2337
43. LS 166, No. 3:24-cv-05331, MDLC ID 2344
44. LS 359, No. 3:24-cv-05908, MDLC ID 2355
45. LS 314, No. 3:24-cv-06016, MDLC ID 2356

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46. LS 516, No. 3:24-cv-05829, MDLC ID 2363
47. LS 5, No. 3:24-cv-05853, MDLC ID 2367
48. LS 421, No. 3:24-cv-05941, MDLC ID 2371
49. LS 272, No. 3:24-cv-05390, MDLC ID 2372
50. LS 15, No. 3:24-cv-05933, MDLC ID 2380
51. LS 367, No. 3:24-cv-06027, MDLC ID 2383
52. LS 4, No. 3:24-cv-05861, MDLC ID 2385
53. LS 399, No. 3:24-cv-05865, MDLC ID 2387
54. LS 423, No. 3:24-cv-05676, MDLC ID 2389
55. LS 517, No. 3:24-cv-05726, MDLC ID 2394
56. LS 232, No. 3:24-cv-05327, MDLC ID 2398
57. LS 211, No. 3:24-cv-05983, MDLC ID 2399
58. LS 416, No. 3:24-cv-05335, MDLC ID 2417
59. LS 136, No. 3:24-cv-05475, MDLC ID 2420
60. LS 199, No. 3:24-cv-05402, MDLC ID 2423
61. LS 274, No. 3:24-cv-05902, MDLC ID 2427
62. LS 319, No. 3:24-cv-05800, MDLC ID 2428
63. LS 291, No. 3:24-cv-06020, MDLC ID 2433
64. LS 504, No. 3:24-cv-05928, MDLC ID 2440
65. LS 141, No. 3:24-cv-05634, MDLC ID 2448
66. LS 44, No. 3:24-cv-05595, MDLC ID 2449
67. LS 197, No. 3:24-cv-06003, MDLC ID 2451
68. LS 202, No. 3:24-cv-05333, MDLC ID 2453
69. LS 464, No. 3:24-cv-5153, MDLC ID 2466
70. LS 304, No. 3:24-cv-05914, MDLC ID 2470
71. LS 373, No. 3:24-cv-05328, MDLC ID 2473
72. LS 184, No. 3:24-cv-05609, MDLC ID 2474
73. LS 487, No. 3:24-cv-05611, MDLC ID 2478
74. LS 209, No. 3:24-cv-06033, MDLC ID 2482
75. LS 188, No. 3:24-cv-06022, MDLC ID 2487
76. LS 125, No. 3:24-cv-05982, MDLC ID 2489
77. LS 368, No. 3:24-cv-05898, MDLC ID 2490
78. LS 425, No. 3:24-cv-05885, MDLC ID 2499
79. LS 305, No. 3:24-cv-05338, MDLC ID 2501
80. LS 433, No. 3:24-cv-05737, MDLC ID 2502
81. LS 180, No. 3:24-cv-05936, MDLC ID 2503
82. LS 206, No. 3:24-cv-05419, MDLC ID 2509
83. LS 369, No. 3:24-cv-05915, MDLC ID 2512
84. LS 3, No. 3:24-cv-05760, MDLC ID 2513
85. LS 119, No. 3:24-cv-05937, MDLC ID 2514
86. LS 462, No. 3:24-cv-05329, MDLC ID 2518
87. LS 275, No. 3:24-cv-05415, MDLC ID 2526
88. LS 113, No. 3:24-cv-05656, MDLC ID 2529
89. LS 403, No. 3:24-cv-05722, MDLC ID 2533

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- 90. LS 189, No. 3:24-cv-05379, MDLC ID 2536
- 91. LS 441, No. 3:24-cv-05751, MDLC ID 2537
- 92. LS 60, No. 3:24-cv-05618, MDLC ID 2538
- 93. LS 277, No. 3:24-cv-05944, MDLC ID 2544
- 94. LS 342, No. 3:24-cv-05913, MDLC ID 2545
- 95. LS 201, No. 3:24-cv-05354, MDLC ID 2548

In addition, the following Levin Simes Plaintiffs joined the MDL after September 2, 2024 but have not provided the required PFS within 30 days of filing their complaints:

1. LS 530, No. 3:24-cv-07143, MDLC ID 2623<sup>1</sup>
2. LS 531, No. 3:24-cv-07144, MDLC ID 2624<sup>2</sup>
3. LS 532, No. 3:24-cv-06927, MDLC ID 2651<sup>3</sup>
4. LS 533, No. 3:24-cv-06929, MDLC ID 2652<sup>4</sup>
5. LS 534, No. 3:24-cv-07142, MDLC ID 2653<sup>5</sup>

In each of the cases above, please provide the overdue PFS by no later than December 4, 2024. Uber reserves all rights with respect to any Plaintiff who does not provide the overdue PFS within this timeframe, including the right to move for dismissal with prejudice.

Sincerely,

**PAUL, WEISS, RIFKIND, WHARTON  
& GARRISON LLP**

By: /s/ Kyle Smith

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<sup>1</sup> Complaint filed on October 12, 2024.

<sup>2</sup> Complaint filed on October 12, 2024.

<sup>3</sup> Complaint filed on October 3, 2024.

<sup>4</sup> Complaint filed on October 3, 2024.

<sup>5</sup> Complaint filed on October 12, 2024.